

**CWA RECONNAISSANCE INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5**

Purpose: Compliance Evaluation Reconnaissance Inspection

Facility: Breese Site Hog Farm
19722 Low Bridge Road
Breese, Illinois 62230

NPDES Permit Number: None

Date of Inspection: October 25, 2010

EPA Representatives: Joan Rogers, Environmental Scientist 312-886-2785
Felicia Chase, Environmental Scientist 312-886-0240
Mike Lukowich, Environmental Scientist 312-353-4645

State Representatives: None

Facility Representatives: FOIA Exemption (b) (6) Manager 217-556-6833

Report Prepared by: Joan Rogers, Environmental Scientist 312-886-2785
rogers.joan@epa.gov

Report Date: December 2, 2010

Inspector Signature _____

A handwritten signature in cursive script, appearing to read "Joan Rogers", is written over a horizontal line.

BACKGROUND

The purpose of this inspection is to evaluate and document the Breese Site Hog Farm's compliance with the interim measures required by the Administrative Order, docket number V-W-10-AO-09, at its Breese, Illinois facility on October 25, 2010.

Breese Site is a swine operation in Clinton County, Illinois. [FOIA Exemption (b) (6)] leases the barns from MSSA Partnership. [FOIA Exemption (b) (6)] and [FOIA Exemption (b) (6)] are the partners of in the MSSA Partnership. The Breese Site is a swine finishing operation and on February 10, 2010, the barns were emptied of approximately 5000 hogs. The swine are fed and maintained for approximately the six months prior to February 10, 2010. Breese Site is considered a large swine Concentrated Animal Feeding Operation (CAFO) due to the number of swine maintained on the facility. There is currently no National Pollutant Discharge Elimination System (NPDES) permit allowing discharge from the site and the facility has never applied for one.

An Unnamed Tributary of Shoal Creek flows through the facility. The Unnamed Tributary flows eastward before flowing into Shoal Creek. The facility property ends at Shoal Creek. Shoal Creek is a water of the United States and it flows into the Kaskaskia River which flows directly to the Mississippi River. The Kaskaskia River and the Mississippi River are also waters of the United States. Shoal Creek is listed on Illinois' 303d list of impaired waterways as impaired for pathogens, nutrients and dissolved oxygen.

SITE INSPECTION

EPA contacted [FOIA Exemption (b) (6)] by phone at approximately 1:00 P.M. and informed him that EPA was close to his [FOIA Exemption (b) (6)] Pork Farms facility on Snow Cemetery Road in Greenville, Illinois and requested permission to access the site. [FOIA Exemption (b) (6)] stated that he was only about half an hour away and expressed that he would like to accompany EPA on the inspection.

EPA arrived at the [FOIA Exemption (b) (6)] Pork site and waited for [FOIA Exemption (b) (6)]. When [FOIA Exemption (b) (6)] arrived, EPA put on disposable boots, presented credentials and explained that the purpose of the inspection was to document the implementation of the interim measures that were required by the Administrative Order. [FOIA Exemption (b) (6)] had not provided documentation to EPA as of the date of the inspection. EPA also intended to drive to the Breese Site Hog Farm and document the interim measures at that facility. [FOIA Exemption (b) (6)] stated that he had taken photos of the Breese Site's interim measures, but had not sent them to EPA. He explained that he had the camera with the photos in his vehicle and that he would give the camera to EPA to download the photos.

EPA performed a reconnaissance inspection at the [FOIA Exemption (b) (6)] Pork facility. [FOIA Exemption (b) (6)] accompanied EPA on only the first portion of the inspection. At the closing conference for the [FOIA Exemption (b) (6)] Pork facility, [FOIA Exemption (b) (6)] explained that he would not be accompanying EPA at the Breese Site and gave permission for EPA to access and inspect. [FOIA Exemption (b) (6)] gave his camera to EPA and en route to the Breese Site Hog Farm, EPA downloaded the photos off the camera to an EPA laptop computer.

At the Breese Site, EPA put on fresh pairs of disposable boots and approached the house on the site where the manager, [FOIA Exemption (b) (6)] resides. EPA presented

credentials and explained the purpose of the inspection to [FOIA Exemption (b) (6)] and detailed the areas of the site that were of interest. [FOIA Exemption (b) (6)] stated that the Breese Site recently acquired some young pigs. They were currently being housed in Barns #6 and #8. According to [FOIA Exemption (b) (6)] some of the pigs in Barn #6 were sickly and he and [FOIA Exemption (b) (6)] were unsure what was afflicting them. EPA stated that they would stay in the vehicle while viewing the 5-6 Lagoon behind Barn #6. EPA gave the camera from [FOIA Exemption (b) (6)] to [FOIA Exemption (b) (6)] explained that he would not be able to accompany EPA during the inspection.

EPA drove down the driveway toward Barns #5 and #6. The 5-6 Lagoon behind Barn #6 had been pumped down and a depth gauge installed. EPA did not exit the vehicle and therefore was not able to view the northeast corner of Barn #6 where previously there had been manure discharging. EPA estimated that there was approximately two to three feet of freeboard in the 5-6 Lagoon.



DSC_7536: 5-6 Lagoon has been pumped down and depth gauge installed.

Location: From EPA vehicle at southwest corner of 5-6 Lagoon.

Facing: Northeast

Date/Time: October 25, 2010 4:44 P.M.



DSC_7537: Close up of depth gauge in 5-6 Lagoon. Approximately two to three feet of freeboard in 5-6 Lagoon.

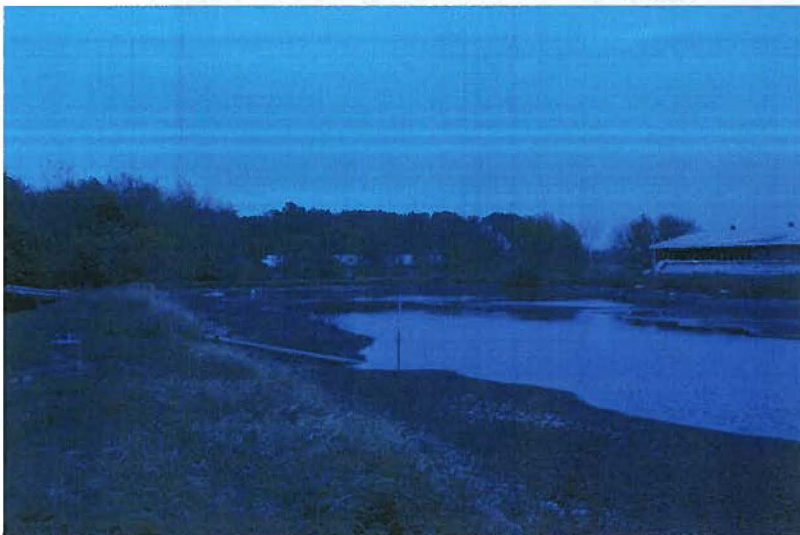
Location: From EPA vehicle at southwest corner of 5-6 Lagoon.

Facing: Northeast

Date/Time: October 25, 2010 4:45 P.M.

EPA observed the discharge location on the south side of Barn #3 and did not observe any new discharge pathways. Barns #1 through #4 are currently empty of hogs.

EPA then drove to the driveway that led to the Complex Lagoon behind Barn #1. Again, the pond had been pumped down and a depth gauge installed. EPA estimated that the pond had approximately two to three feet of freeboard.



DSC_7540: Complex Lagoon has been pumped down. EPA estimated that there is approximately two to three feet of freeboard in Complex Lagoon. Depth gauge is installed.

Location: Northwest corner of Complex Lagoon.

Facing: East

Date/Time: October 25, 2010 4:48 P.M.



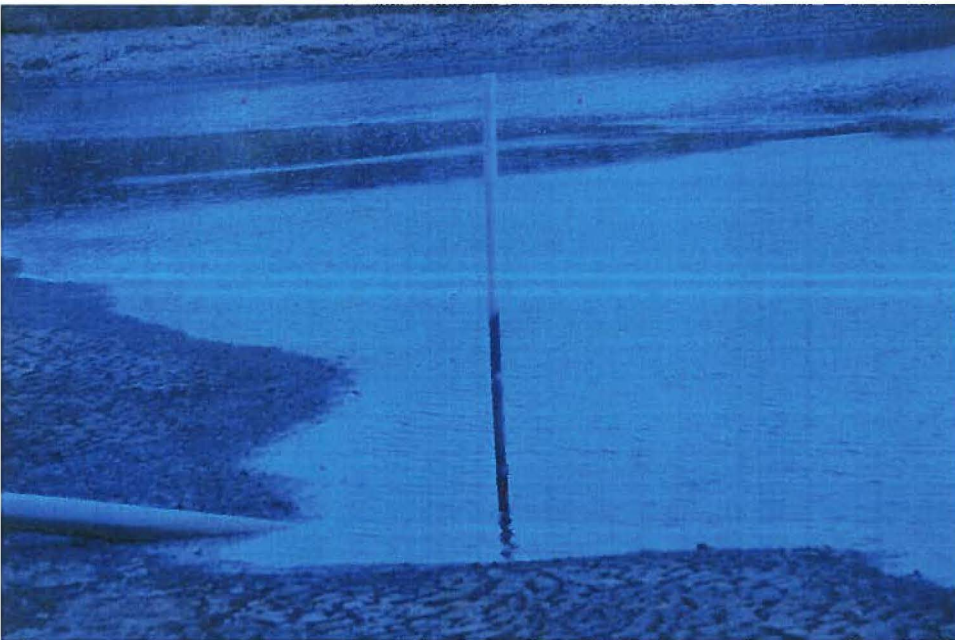
DSC_7541: Complex Lagoon has been pumped down.
Location: Northwest corner of Complex Lagoon.
Facing: Southeast
Date/Time: October 25, 2010 4:48 P.M.



DSC_7542: Complex Lagoon has been pumped down.
Location: Northwest corner of Complex Lagoon.
Facing: South
Date/Time: October 25, 2010 4:48 P.M.



DSC_7543: Complex Lagoon has been pumped down.
Location: Northwest corner of Complex Lagoon.
Facing: Southwest
Date/Time: October 25, 2010 4:48 P.M.



DSC_7544: Close up of depth gauge in Complex Lagoon.
Location: Northwest corner of Complex Lagoon.
Facing: East
Date/Time: October 25, 2010 4:48 P.M.

EPA concluded the reconnaissance inspection by driving to the north along Low Bridge Road and turning into the driveway to the North Lagoons by Barn #7.

Previous discharges in this section of the facility included discharges from the southwest corner of the West North Lagoon and the southeast side of the East North Lagoon. On the date of this reconnaissance inspection, the ponds had been pumped down and a depth gauge installed in the West North Lagoon. EPA estimated there to be approximately three feet of freeboard. A previous water main break on the west side of Barn #7 had been repaired, and the failed roof over Barn #7 had been covered to prevent storm water from accessing the underground pit and then flowing to the pond system.

EPA left the disposable boots in the garbage dumpster by Barn #8 and exited the facility at approximately 5:00 P.M. EPA took the vehicle in for a car wash after the inspection, for bio-security measures.



DSC_7545: West North Lagoon has been pumped down and a depth gauge installed.

Location: Northwest corner of West North Lagoon.

Facing: South

Date/Time: October 25, 2010 4:54 P.M.



DSC_7546: West North Lagoon in foreground and East North Lagoon in background.
Location: Northwest corner of West North Lagoon.
Facing: East
Date/Time: October 25, 2010 4:55 P.M.

From the photos provided to EPA by [FOIA Exemption (b) (6)] from the camera given to EPA on October 25, 2010, one set of photos was almost entirely comprised of photos of young pigs inside the barns and the dates on the photos are from a time period before EPA's first inspection on March 18, 2010.

The second set of photos has 17 photos of the ponds and barns. These photos are similar to the photos taken by EPA and they show that the ponds have been pumped. There are no photos that document the interim measures taken to eliminate discharges from the northeast corner of Barn #6. The photos also do not show any interim measures taken to eliminate discharges from the cleanout pipes from Barns #3 and #4.